

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 08 CR 00009-2
v.)	
)	Honorable Virginia M. Kendall,
LEON AMIEL, JR.,)	presiding
a/k/a LEON GLASS)	
Defendant.)	

MOTION FOR INVENTORY OF PROPERTY SEIZED AND
FOR RETURN OF SEIZED PROPERTY

Now comes the defendant, LEON AMIEL, by and through his court appointed counsel, Thomas A. Gibbons, of Kreiter and Gibbons & Associates, pursuant to Rules 16 (E) and 41(G) of the Federal Rules of Criminal procedure, and Brady v. Maryland, 373 U.S. 83 (1963), and moves this Honorable Court to enter an order requiring the government to provide an inventory of property seized and directing the government to return certain property seized, and in support thereof states as follows:

1. The defendant is engaged in the business of producing, printing, buying, and selling artwork.
2. The defendant is charged in an art fraud scheme, in which the indictment alleges that the defendant was involved in a scheme to reproduce and distribute artwork of prominent artists without the permission of the artist.
3. On January 16, 2008, law enforcement authorities executed a search warrant at the defendant's residence located at 18 Denver Drive, New City, New York, and also searched storage units used by the defendant located at his residence and at 259 N. Route 8W, Congers, New York, at which time the authorities seized thousands of

pieces of artwork and other items, including contracts and other documents, computer discs and DVDs, letters, books, plates, and other items which have not been disclosed to the defendant.

3. The vast majority of artwork seized is not contraband, and the contracts and documents seized provide evidence of the defendant's right to possess, duplicate, and/or sell various pieces of the artwork.

4. The defendant does not have an inventory of the items seized, and the government has not provided a list of the articles seized.

5. As a result of the seizure, the defendant has been unable to conduct his business and is on the brink of bankruptcy.

6. The defendant seeks the return of his property, including but not limited to the following items:

- a. All Miro book pages offset from the book published by Tudor Publishing Co., an entity owned by Leon Sr., entitled The Indelible Miro;
- b. Miro "Dandy" that was stolen by James Kennedy and authenticated by Mary Bartow;
- c. All Dali Giclee images from Maxinter Bill Levine all printed under contract and legal;
- d. All Amiel Chagall Facsimile Giclees;
- e. The "Edition" book with all the Edition Numbers and to whom the prints were sold;
- f. all Chagall Lithographs from Leon Amiel;
- g. All Signed Dali works which were disclaimed or real;
- h. All Marino Marini lithographs and art books as well as all the signed and unsigned book pages. Leon Amiel Sr. and his predecessor were the publishers and never has any Marino Marini been deemed fake to the defendant's knowledge;

- i. Miro lithograph series book pages unsigned and plate signed all original lithos;
- j. All Chagall exodus unsigned lithos. Leon Sr. was the publisher and the defendant's family retains the rights to produce any and all images of the Exodus;
- k. All Miro, Chagall, and Dali offset lithos;
- l. All Contracts and Paperwork;
- m. All Art books;
- n. All Giclee printed works and proofs;
- o. All Computer Disk and DVDs;
- p. The return of all seals;
- q. All Calder book pages and images that were unsigned;
- r. All portfolios from Miro, Chagall, Dali, and Marino Marini;
- s. An original signed letter from Dali with the Amiel Logo which Dali designed from Leon Amiel, Sr;
- t. All Dali copper plates, which are defaced, worn down, and unusable.

WHEREFORE, the defendant respectfully requests that this Honorable Court enter an order requiring the government to provide an inventory of property seized and directing the government to return certain property seized.

Respectfully Submitted,

s/Thomas A.Gibbons

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